## UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: GEORGE L. CASSELBURY and : CHAPTER 13

JACQUELINE L. CASSELBURY

Debtor(s)

:

CHARLES J. DEHART, III

STANDING CHAPTER 13 TRUSTEE

Movant

:

VS.

:

GEORGE L. CASSELBURY and

JACQUELINE L. CASSELBURY

Respondent(s) : CASE NO. 5-17-bk-04641

## TRUSTEE'S OBJECTION TO FOURTH AMENDED CHAPTER 13 PLAN

AND NOW, this 22nd day of October, 2018, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

- 1. Trustee avers that debtor(s)' plan is not feasible and cannot be administered due to the lack of the following:
  - a. Proof of Claims for 2013 Ford F250 and 2012 Grizzly Tracker.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

(717) 566-6097

BY: /s/Agatha R. McHale

Attorney for Trustee

## **CERTIFICATE OF SERVICE**

AND NOW, this 22nd day of October, 2018, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

John Thompson, Esquire 304 North Keystone Avenue Sayre, PA 18840

/s/Deborah A. Behney
Office of Charles J. DeHart, III
Standing Chapter 13 Trustee